

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 11
	:	
BEECH INTERNATIONAL, LLC¹	:	Case No. 24-14406 (AMC)
	:	
	:	
Debtor	:	

**CERTIFICATION OF COUNSEL REGARDING INTERIM ORDER (I) PROHIBITING
UTILITY COMPANIES FROM ALTERING, REFUSING OR DISCONTINUING
SERVICE TO THE DEBTOR, (II) DEEMING UTILITY COMPANIES ADEQUATELY
ASSURED OF FUTURE PAYMENT AND (III) ESTABLISHING PROCEDURES FOR
DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE**

JASON C. MANFREY, of full age, hereby certifies as follows:

1. I am a shareholder with the law firm of Stevens & Lee P.C. (“S&L”), proposed attorneys for Beech International, LLC (the “Debtor”), the debtor and debtor-in-possession in the above captioned case.

2. On December 11, 2024, the Debtor filed the *Debtor’s Motion for an Interim and Final Order (I) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Service to the Debtor, (II) Deeming Utility Companies Adequately Assured of Future Payment; and (II) Establishing Procedures for Determining Requests for Additional Adequate Assurance* (the “Motion”) [Docket No. 6].

3. Subsequent to the filing of the Motion, the Debtor received informal comments from the Office of the United States Trustee and the Philadelphia Water Department.

4. The informal comments received from the Office of the United States Trustee and the Philadelphia Water Department have been resolved by way of revisions to the form of Order.

¹ The last four digits of the Debtor’s tax identification number are 7019.

5. Aside from the informal comments from the Office of the United States Trustee and the Philadelphia Water Department, I hereby certify that I have received no answer, objection, or other responsive pleading to the Motion. I further certify that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Date of Expedited Hearing on the Motion, written objections to the Motion are to be filed and served no later than December 16, 2024 at 12:00 p.m. (ET).

6. The attached revised proposed form of order (the "Proposed Order") complies with the informal comments received from the Office of the United States Trustee and the Philadelphia Water Department. A clean copy of the Proposed Order is attached hereto as **Exhibit "A"**. A "black lined" comparison of the Proposed Order compared to the original proposed order is attached hereto as **Exhibit "B"**.

Dated: December 16, 2024

Respectfully submitted,
STEVENS & LEE, P.C.

/s/ Jason C. Manfrey
Robert Lapowsky
Jason C. Manfrey
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
Telephone (215) 751-2866
Facsimile (610) 371-7958
Robert.lapowsky@stevenslee.com
Jason.manfrey@stevenslee.com